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PG&E CORPORATION and  
PACIFIC GAS AND ELECTRIC COMPANY,  
(erroneously sued herein as PACIFIC GAS & ELECTRIC COMPANY)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

CAMERON BEATTY, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

SUNGAGE FINANCIAL, LLC, a  
Massachusetts limited liability company; NBT  
BANK, N.A., an New York Corporation;  
SUNMADE ENERGY, LLC, a California  
limited liability company; PG&E  
CORPORATION, a California Corporation,  
PACIFIC GAS & ELECTRIC COMPANY, a  
California Corporation, and DOES 1 through  
50, inclusive,

Defendants.

Case No. 1:25-cv-00645-KES-SKO

**STIPULATION AND UNOPPOSED  
MOTION TO EXTEND TIME FOR  
DEFENDANTS PG&E CORPORATION  
AND PACIFIC GAS AND ELECTRIC  
COMPANY TO RESPOND TO  
COMPLAINT; ORDER**

(Doc. 14)

Pursuant to Fed. R. Civ. P. 6(b)(1) and Local Rule 144, Plaintiff Cameron Beatty (“Plaintiff”) and Defendants PG&E Corporation and Pacific Gas and Electric Company (erroneously sued herein as Pacific Gas & Electric Company), (“Defendants”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and request that the Court enter an Order on this Stipulation extending the deadline for Defendants to respond to the Complaint by forty-five (45) days from July 11, 2025, to August 25, 2025. Good cause exists for this Stipulation as follows:

1. Plaintiff filed the Complaint on May 30, 2025.

2. Defendants were served with the Summons and Complaint on June 20, 2025, making July 11, 2025, the deadline for filing a responsive pleading.

3. Defendants retained counsel on July 7, 2025. The same day, after reviewing the Complaint, counsel for Defendants contacted Plaintiff's counsel requesting a forty-five (45) day extension of time to respond to the Complaint in order to allow sufficient time for the Parties to meaningfully meet and confer regarding the allegations and claims in the Complaint against Defendants in an effort to avoid or limit motions and as required by the Court's standing order. On July 8, 2025, Plaintiff's counsel agreed to Defendants' request.

4. No prior extensions of time to respond to the Complaint have been granted to Defendants.

For the above reasons, the Parties jointly stipulate and respectfully request that the Court issue an Order on this Stipulation extending the deadline for Defendants to respond to the Complaint by forty-five days to August 25, 2025.

Dated: July 9, 2025

GOUGH & HANCOCK LLP

/s/ Gayle L. Gough

GAYLE L. GOUGH

LAURA L. GOODMAN

Attorneys for Defendants

PG&E CORPORATION and

PACIFIC GAS AND ELECTRIC COMPANY

Dated: July 10, 2025

INGBER LAW GROUP

/s/ Jason M. Inger

JASON M. INGBER

Attorney for Plaintiff

CAMERON BEATTY

**ORDER**

Based on the parties' stipulation and unopposed motion (Doc. 14), and for good cause shown, IT IS HEREBY ORDERED that Defendants PG&E CORPORATION AND PACIFIC GAS AND ELECTRIC COMPANY, shall file their pleadings responsive to Plaintiff Cameron Beatty's Complaint (Doc. 1) on or before August 25, 2025.

IT IS SO ORDERED.

Dated: **July 10, 2025**

*/s/ Sheila K. Oberto*  
UNITED STATES MAGISTRATE JUDGE